

Houston, TX. April 27, 2020

Mr. David J. Bradley

Clerk of Court

P.O. Box 61010

Houston, TX 77208

United States Courts  
Southern District of Texas  
FILED

MAY 06 2020

David J. Bradley, Clerk of Court

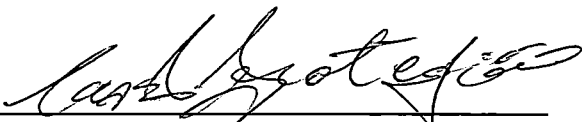
Carlos Amilcar Uzcategui vs. Tri-County Gin of North Mississippi, LLC; Steve Ratcliff, Kenny Bolen and Keith Pearson; Civil Action No: 4:20-CV-00935. United States District Court, Southern District of Texas, Houston Division.

Dear Mr. Bradley,

Included is Plaintiff CARLOS UZCATEGUI support and documentation for filing in the about – case # 4:20-CV-00935.

I do appreciate your attention in this matter.

Sincerely,

  
\_\_\_\_\_  
Plaintiff CARLOS UZCATEGUI

Cc. Tri-County Gin of North Mississippi, LLC

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CARLOS AMILCAR UZCATEGUI

PLAINTIFF

VS.

CIVIL ACTION NO: 4:20-CV-00935

TRI-COUNTY GIN OF NORTH MISSISSIPPI, LLC

DEFENDANTS

STEVE RATCLIFF; KENNY BOLEN; AND KEITH PEARSON

PLAINTIFF CARLOS UZCATEGUI SUSTAINS OF THE FACTS

Herein, plaintiff Carlos Uzcategui and file this response to the defendant Keith Pearson, Motion to Dismiss. For the following reasons; Motion to dismiss should be denied and in support would expose the following grounds.

- 1) The above court has jurisdiction because: In accordance with the GUIDELINES FOR LITIGANTS WITHOUT LAWYERS SOUTHERN DISTRICT OF TEXAS, it states: (when the plaintiff and defendant are residents of different states) the suit may be brought in the district where the plaintiff resides (28 U.S.C. § 1391). File 3 b

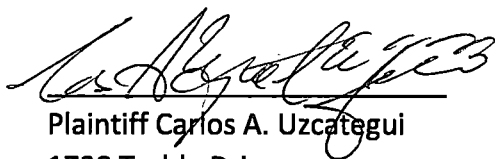
- 2) In accordance to FRCP 12 (b) 5 Plaintiff Carlos Uzcategui served defendant Keith Pearson via Post Office Certified Mail delivered on 04/03/2020, Article Number 19 2280 0001 1720 2880 and was received and signed by Shannon Ready, Paralegal of THE PEARSON LAW FIRM, PLLC. 428 North Lamar, Suite 108, Oxford, Mississippi, 38655.  
  
All sufficient documentation was sent via certified mail with barcode 9590 9402 3345 7227 7989 48, delivered on 04/17/2020 to TRI-COUNTY GIN of NORTH MISSISSIPPI, LLC.
- 3) Defendant Keith Pearson said was not involved but mentioned having knowledge on the events that occurred in Tri-County Gin of North Mississippi. Pointed that Plaintiff Carlos Uzcategui, precipitated the Lawsuit.

It was on Plaintiff Uzcategui duty to meet with the Mayor of the City of Batesville, MS. Who then encouraged plaintiff Uzcategui to report the hate crime because the severity of the events. Plaintiff Uzcategui was escorted by David Carr (City of Batesville public works) to the City of Batesville Police Department to make the case's report.

Subsequently in Houston, TX. Harris County where Plaintiff Uzcategui permanently resides; reported the Employment discrimination case to the ANTI DEFAMATION LEAGUE, Southern Regional Office. The EEOC, The OSHA, and Wage and Hour Division. Also a medical issue as a result of the events that happened in Batesville, MS.

ACCORDINGLY, Plaintiff Carlos Uzcategui respectfully request that, Defendant Keith Pearson's Motion to dismiss should be denied for the previous descriptions and Local Rules.

Respectfully,

A handwritten signature in black ink, appearing to read 'Carlos A. Uzcategui', is written over a horizontal line.

Plaintiff Carlos A. Uzcategui  
1738 Treble Drive  
Humble, TX 77338  
Mobile: (713) 340-4428